

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)
)
JULIE ANNE STAMPS) Case No. 21-02597-CW3-13
) Judge Walker
Debtor) Chapter 13

JOINT MOTION TO RESET HEARING ON CONFIRMATION OF THE DEBTOR'S
PROPOSED CHAPTER 13 PLAN, TRUSTEE'S MOTION TO DISMISS OR IN THE
ALTERNATIVE CONVERT, AND DEBTOR'S MOTION TO EMPLOY PROFESSIONAL

The Court set the debtor's Motion to Employ Professional (docket entry 21) for hearing on November 10, 2021 at 8:30 a.m. At the November 10, 2021 hearing, the parties requested that the Court reset the matter for December 1, 2021. At this time, the parties are in continuing discussions regarding resolution of the matter and believe a continuance would be beneficial.

In addition, because the Motion to Employ may have a potential impact on confirmation of the debtor's proposed plan, the parties agree that the hearing on confirmation and the Trustee's Motion to Dismiss or in the Alternative Convert for Cause for Failure to Confirm a Proposed Plan (docket entry 22) should also be reset. The parties propose for the three matters to be reset for December 22, 2021 at 8:30 a.m. in Courtroom 1, 2nd Floor Customs House, 701 Broadway, Nashville, Tennessee 37203.

Respectfully submitted,

/s/ Margaret P. Reidy
Margaret P. Reidy
Counsel to Henry E. Hildebrand, III
Standing Chapter 13 Trustee
P. O. Box 340019
Nashville, TN 37203-0019
(615) 244-1101; fax (615) 242-3241
pleadings@ch13nsh.com
Attorney for Chapter 13 Trustee

/s/ Daniel T. Castagna (with permission)
Daniel T. Castagna
Flexer Law PLLC
1900 Church St., Suite 400
Nashville, TN 37203
615-255-2893
cm-ecf@flexerlaw.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on November 30, 2021, true and correct copies of the attached notice, motion, and proposed order were served in the following manner:

By Electronic Case Noticing to:

U.S. Trustee, 318 Customs House, 701 Broadway, Nashville, TN 37203

By U. S. Postal Service, postage prepaid to:

Julie Anne Stamps, 2620 New Salem Hwy Apt., R306, Murfreesboro, TN 37128

Flexer Law, PLLC, 1900 Church St., Suite 400, Nashville, TN 37203

Respectfully submitted,

/s/ Margaret P. Reidy

Margaret P. Reidy

Counsel to the Chapter 13 Trustee